

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

_____)	
PLA-FIT FRANCHISE LLC,)	
)	
Plaintiff,)	
)	Civil Action No. 2:15-cv-00315-NT
v.)	
)	
JASON COLE,)	
)	
Defendant.)	
_____)	

**JOINT MOTION FOR PRELIMINARY INJUNCTION
AND EXTENSION OF TIME TO FILE ANSWER**

On August 10, 2015, Plaintiff Pla-Fit Franchise, LLC (“Planet Fitness”) moved on an ex parte basis for a temporary restraining order against its former employee, Defendant Jason Cole (“Cole”). A hearing was held on that motion on August 10, 2015, and the Court (Levy, J.) granted the motion that evening. Over the following days, Planet Fitness and Cole have engaged in settlement discussions, which remain in progress, and Cole returned some property to Planet Fitness. Judge Levy’s Order is set to expire on August 24, 2015. The parties hereby jointly move for a 30 day preliminary injunction extending Judge Levy’s temporary restraining order, so that they may continue to work together in good faith towards a resolution of the case. Additionally, the parties request that defendant Cole be granted a 30-day extension to file his answer.

This Motion does not constitute an admission of liability by either party and both parties reserve their rights.

Respectfully Submitted,

Pla-Fit Franchise, LLC.

Jason Cole

By its attorneys,

By his attorney,

/s/ Rebecca J. Sivitz

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2015, I electronically filed the above Joint Motion for Preliminary Injunction and Extension of Time to File Answer with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

/s/ Adrienne E. Fouts
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